

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

PUEBLO OF JEMEZ, a federally  
recognized Indian tribe, Case No. 1:12-cv-800(RCB)(WPL)  
Plaintiff,

VS.

UNITED STATES OF AMERICA,  
Defendant,

and

NEW MEXICO GAS COMPANY,  
Defendant-in-Intervention.

DEPOSITION OF PAULINE TOLEDO CORREO

Tuesday, August 15, 2017

9:11 a.m.

7424 4th Street, NW  
Albuquerque, New Mexico

PURSUANT TO THE NEW MEXICO RULES OF CIVIL  
PROCEDURE this deposition was:

TAKEN BY: PETER KRYN DYKEMA, ESQ.  
FOR DEFENDANT UNITED STATES OF AMERICA

REPORTED BY: MAUREEN R. COSTELLO, CCR  
New Mexico CCR No. 220  
Hunnicut, Costello Reporting  
Post Office Box 68  
Glorieta, New Mexico 87535

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1 unhappy if they were hunting in the immediate vicinity of  
2 the Bonds' cattle.  
3 A. Well, in the wintertime -- in the fall time, they  
4 took the cattle out. They took them. There was no cattle  
5 there. There was just sheep there in the wintertime.  
6 Q. Is there no hunting during the summer,  
7 traditionally?  
8 A. No, they don't hunt in the summertime, not for  
9 wild game, only in the fall time.  
10 Q. During what months do the Jemez people  
11 traditionally hunt within the Caldera?  
12 A. From October to about -- till it gets snowbound.  
13 It used to get snowbound. Maybe till about November.  
14 Because at that time there was no highway. It was all dirt  
15 roads, and everybody had to ride horses or go on wagons.  
16 Q. Do you know if the Bonds put any limits on the  
17 number of animals that the Jemez people could kill in a  
18 given season?  
19 A. No. I don't think they were even there because  
20 the Spanish men, Spanish people, did the shepherding and  
21 taking care of the cattle; but the Bonds brothers were just  
22 there like for maybe -- they weren't there 24/7, though.  
23 Q. So they had a crew of men --  
24 A. Yes.  
25 Q. -- running the ranch.

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1 A. Yeah.  
2 Q. And they, as often as not, were back in Texas.  
3 A. Yes.  
4 Q. Did the ranch workers live in the buildings there?  
5 A. Yes. They had cabins there.  
6 Q. Apart from when you were staying at the Howard H.  
7 House -- at HHH Ranch, excuse me. Let me start over again.  
8 Apart from the time when you lived at the HHH  
9 Ranch, have you hunted in the Valles Caldera?  
10 A. Yes, as a kid.  
11 Q. Describe that. I mean, did you go with your  
12 father?  
13 A. I went with my father, yes.  
14 Q. And where did you hunt with your father?  
15 A. Way up. Let's see. Near this Jaramillo Creek  
16 (indicating) right into the Valles Caldera. Probably like  
17 about right in this area (indicating).  
18 Q. Can I ask you to mark that with a yellow Sharpie,  
19 the area where you and your father hunted.  
20 A. Probably in this area (indicating) because --  
21 Yeah.  
22 Q. Thank you. And it's right next to what is today a  
23 parking area?  
24 A. Well, it was maybe further back, then.  
25 Q. Well --

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1 A. Oh, okay. But it was right in this (indicating).  
2 Is this the main entrance right there now? Because there's  
3 a main entrance right in here (indicating), and then  
4 there's that parking area now. So maybe it was further  
5 back, in this area then (indicating).  
6 Q. Valle Jaramillo?  
7 A. But I remember this creek there, so it must have  
8 been maybe right in this area (indicating), then, because  
9 we could see Redondo Peak from there, because there's three  
10 other peaks right there.  
11 Q. Okay. Can you mark that area?  
12 A. (Witness complied.)  
13 Q. Thank you.  
14 A. Because from here (indicating) there's about two  
15 big peaks right there. So, yeah, it was about right there  
16 (indicating).  
17 Q. And the area you marked now is just a little bit  
18 south of the "M" in Valle Jaramillo?  
19 A. Right there (indicating). I'm pretty sure because  
20 there's that creek. I remember that creek coming in  
21 through there.  
22 Q. And what's the name of that creek?  
23 A. Jaramillo.  
24 Q. Thank you.  
25 So the hunting you did with your dad, when you

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1 were young, would have been in the '50s?  
2 A. No. In the '40s.  
3 Q. The '40s.  
4 A. Like about '47 maybe.  
5 Q. Okay. But that's when you were at the HHH Ranch?  
6 A. Yes.  
7 Q. But did you hunt with your dad after you were no  
8 longer at the HHH Ranch?  
9 A. No, I didn't hunt anymore.  
10 Q. Okay.  
11 A. Because I was in boarding school by then.  
12 Q. Whereabouts?  
13 A. I went to boarding school at Santa Fe Indian  
14 School, and I was there for a long time.  
15 Q. When you were hunting, could you shoot as many  
16 deer as you wanted?  
17 A. No. We only did one because we didn't -- we  
18 didn't have no refrigeration, so we had to mostly dry it,  
19 the whole thing.  
20 Q. Did you leave any meat for the Bonds or for their  
21 ranch hands?  
22 A. No. There was nobody there; just the  
23 shepherders, but they didn't want any because they had  
24 their own. And that's where we killed a doe; and then when  
25 we went back that evening to get the doe, there was two

8 (Pages 26 to 29)